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Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 SC

MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-1173;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776;

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Best Buy Co., et al. v. Hitachi, Ltd., et al., No. 11-cv-05513;

Best Buy Co., et al. v. Technicolor SA, et al., No. 13-cv-05264;

Target Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

**DECLARATION OF GERARD A. DEVER
IN SUPPORT OF INDIRECT
PURCHASER PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 *Sears, Roebuck and Co. and Kmart Corp. v.*)
2 *Chunghwa Picture Tubes, Ltd.*, No. 11-cv-)
3 05514;)
4 *Sears, Roebuck and Co. and Kmart Corp. v.*)
5 *Technicolor SA*, No. 13-cv-05262;)
6 *Viewsonic Corp. v. Chunghwa Picture Tubes,*)
7 *Ltd.* No. 14-cv-02510.)
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1 I, GERARD A. DEVER, declare as follows:

2 1. I am a member of the law firm of Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I submit this Declaration in support of Indirect
5 Purchaser Plaintiffs' Administrative Motion to File Documents Under Seal, related to Indirect
6 Purchaser Plaintiffs' Response to Defendants' *In Limine* No. 12 to Exclude Plaintiffs' "Price
7 Ladder" Theory of Recovery ("IPPs' Response to Defendants' MIL No. 12").

8 2. I am a member in good standing of the bar of the Commonwealth of Pennsylvania,
9 and I am admitted *pro hac vice* to practice before this Court.

10 3. Pursuant to Civil Local Rules 7-11 and 79-5, and in accordance with this Court's
11 General Order No. 62, effective May 10, 2010, IPPs, by and through their counsel, respectfully
12 request an Order permitting filing under seal Exhibits 1 through 3 to the Declaration of Gerard A.
13 Dever in Support of IPPs' Opposition to Defendants' MIL No. 12 ("Dever Declaration").

14 4. Exhibit 1 to the Dever Declaration is excerpts from the deposition of Chih Chun Liu
15 dated February 20, 2013, designated as Highly Confidential by defendants.

16 5. Exhibit 2 to the Dever Declaration is deposition exhibit 1319E, a contact report
17 dated 11/2/2005 (CHU00014218), designated as Confidential by Chunghwa, along with a certified
18 translation.

19 6. Exhibit 3 to the Dever Declaration is a visitation report dated 10/27/1999
20 (CHU00029171E-74E) designated as confidential by Chunghwa, along with a certified translation.

21 7. IPPs Response refers to or contains excerpts from the above Exhibits. These
22 references or excerpts are identified in the Response with yellow highlighting. An unredacted
23 copy of the Motion with yellow highlighting is being submitted to Chambers.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct.

Executed on February 27, 2015, in Philadelphia, Pennsylvania.

/s/ Gerard A. Dever

Gerard A. Dever

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